From:	Lischinsky, Robert [Lischinsky.Robert@epa.gov]
Sent:	10/15/2018 8:05:22 PM
To:	Segall, Martha [Segall.Martha@epa.gov]
CC:	Duffy, Rick [Duffy.Rick@epa.gov]; Ayres, Sara [Ayres.Sara@epa.gov]
Subject:	OIAI/MM2A Reclassification Rule - Draft E-Mail regarding Expedited FAR Request

As mentioned during this morning's meeting, below is a draft e-mail for Susan regarding the expedited FAR Request for MM2A:

Susan,

OAR has recently requested OECA approval for an expedited Final Agency Review (FAR) on the Major Source 2 Area Source (MM2A) proposed rulemaking. Currently, they intend to provide a FAR package for review on October 30 and convene the FAR on November 15. This time frame would allow a 10 working day review of the FAR package. OAR is asking for our response to the expedited FAR request no later than this Friday, October 19.

In light of recent guidance to not approve ADP process waivers until after we have received all materials, we wanted to provide for your consideration the following recommendation as to how to proceed. This recommendation is being provided in coordination with OCE:

Recommend agreeing to the expedited FAR meeting scheduled for November 15 on the condition that OECA receives the complete FAR package by the promised October 30 date (providing the 10 working day review period). However, we also recommend not to respond until October 19 which would follow the Options Selection meeting rescheduled for October 18. At the Options Selection meeting, which has been delegated to Martha Segall and her staff, we would first like to determine if any OECA issues of concern come to light, particularly regarding federal enforceability. If we do not identify any concerns, we will go ahead with our approval of the expedited FAR request. If we do identify any compliance monitoring or enforceability issues during Options Selection, we will immediately bring them to your attention.

Please let us know if you are okay with proceeding as recommended or if you need additional information.